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and Plaza Investment & Consultancy, LLC

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA - SOUTHERN DIVISION

STEVEN NICOLosi, an individual,

Plaintiff,

vs.

MARRIOTT INTERNATIONAL,
INC., MARRIOTT HOTEL
SERVICES, INC., PLAZA
INVESTMENT &
CONSULTANCY, LLC, DOE 1, an
individual, and DOES 2-100,
inclusive,

Defendants.

CASE NO.: 8:22-cv-01561 CJC (KESx)

Discovery Document: Referred to
Magistrate Judge Karen E. Scott

[PROPOSED] ORDER RE:
STIPULATED PROTECTIVE ORDER
RE: CONFIDENTIAL
INFORMATION AND DOCUMENTS

First-Amended Complaint Filed: 9/20/22
Discovery Cut-Off: 10/12/23
Pretrial Conference: 2/12/24
Trial: 2/20/24

Cormac J. Carney, U.S. District Judge

Pursuant to the [PROPOSED] STIPULATED PROTECTIVE ORDER RE:
CONFIDENTIAL INFORMATION AND DOCUMENTS ("Stipulation")
submitted by Plaintiff STEVEN NICOLosi ("Plaintiff" or "NICOLosi") and
Defendants MARRIOTT INTERNATIONAL, INC. ("MII"), MARRIOTT HOTEL
SERVICES, INC., and PLAZA INVESTMENT & CONSULTANCY, LLC'S

1 (collectively “Defendants”) (Plaintiff and Defendants collectively the “Parties”), the
2 Parties seek a Protective Order relating to Defendants’ “Response to Department of
3 Fair Employment and Housing (“DFEH”) Complaint” and all attachments thereto
4 including the various confidential investigation reports, documents, materials, third-
5 party information, employee information, photographs, other
6 confidential/proprietary materials, and other pieces of potential evidence, relating
7 to a prior DFEH investigation of a DFEH Complaint filed by Plaintiff prior to
8 initiating this civil action.

9 **GOOD CAUSE APPEARING THEREFOR**, the Court hereby GRANTS
10 the Protective Order as set forth in the Stipulation.

11 **IT IS SO ORDERED.**

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13 DATED: May 15, 2023

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15 THE HONORABLE KAREN E. SCOTT
16 United States District Court
17 Magistrate Judge
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